

EXHIBIT R

From: Targowska, Anna
To: [Foley, Thomas F.](#); [Sterlin, Ian](#); [Proctor, Wyley](#); [Freeman, Kia](#); ["Peter Siddoway"](#); ["Lynne Borchers"](#)
Cc: [SJAquestiveNC](#); ["E. Bradley Evans"](#); ["Joseph A. Schouten"](#); ["Susan J. St. Clair"](#)
Subject: RE: Aquestive v BioDelivery (No. 19-cv-00505-D) / Indivior et al. v BioDelivery (No. 5:15-cv-350-D)
Date: Monday, February 28, 2022 8:53:41 PM
Attachments: [EAS](#)

Counsel,

Given the scope of this case, the length of time it has taken for BDSI to respond to plaintiffs' numerous requests regarding ESI, as well as the magnitude of records that Aquestive and Indivior ask; are asked to review in response to BDSI's ESI requests, BDSI's ask to further narrow Plaintiffs' ESI search terms is unreasonable. Nonetheless, in the interest of narrowing the dispute between the parties and to avoid further delay, Plaintiffs revise their ESI search term numbers 1, 4-6 as follows:

Search Term No. 1: (film OR laminate OR roll or wafer OR strip OR disc) AND (test OR result OR analy* OR examin* OR devel*) AND (Buprenorphine OR naloxone OR bup* OR nal*) AND (BEMA OR “Bioerodible Mucoadhesive” OR “bilayer”)

Search Term No. 4: (BEMA OR “Bioerodible Mucoadhesive” OR “bilayer”) AND (Aquestive OR MonoSol OR Indivior OR Reckitt OR MSRX OR RB OR Suboxone)

Search Term No. 5: (ARx OR Sharp OR Endo OR Lohmann OR LTS OR Tapemark) AND (Buprenorphine OR naloxone OR bup* OR nal*) AND (BEMA OR “Bioerodible Mucoadhesive” OR “bilayer”)

Search Term No. 6. (Buprenorphine OR naloxone OR bup* OR nal*) AND (film OR laminate OR roll OR wafer OR strip OR disc) AND (BEMA OR “Bioerodible Mucoadhesive” OR “bilayer”)

Plaintiffs' ESI search term numbers 2, 3, 7-10, which are repeated below for convenience, should remain the same:

Search Term No. 2. (8,765,167 OR 167 OR “167 patent” OR “11/517,982” OR 517982 OR “517,982”) AND (Aquestive OR MonoSol OR Indivior OR Reckitt OR MSRX OR RB OR Suboxone)

Search Term No. 3. (N207932 OR N205637 OR 207932 OR 205637) AND (test OR result OR analy* OR examin* OR devel*)

Search Term No. 7. (Myers OR Sanghvi OR Verrall OR Francis OR Moss OR Kendall OR Schobel OR Barber) AND (Aquestive OR MonoSol OR Indivior OR Reckitt OR MSRX OR RB OR Suboxone)

Search Term No. 8. (film OR laminate OR roll OR wafer OR buccal OR sublingual) AND (Aquestive OR MonoSol OR Indivior OR Reckitt OR MSRX OR RB OR Suboxone)

Search Term No. 9. Pharmfilm

Search Term No. 10. (Belbuca OR Bunavail) AND (N207932 OR N205637 OR 207932 OR 205637) AND (test OR result OR analy* OR examin* OR devel*)

As a reminder, Plaintiffs’ ESI search terms are not case sensitive.

Please let us know by the end of business day on March 2, 2022 whether BDSI intends to move forward with production of ESI discovery based on Plaintiffs’ revised search terms. To the extent that BDSI continues to object to Plaintiffs’ search terms, please provide your availability on March 3, 2022 for a meet and confer.

Regards,

Anna

Steptoe

Anna M Targowska

Steptoe & Johnson LLP | 227 West Monroe Street | Suite 4700 | Chicago, IL 60606
direct 312 577 1269 | fax 312 577 1370 | atargowska@Steptoe.com

From: Foley, Thomas F. <tfoley@McCarter.com>

Sent: Thursday, February 24, 2022 1:54 PM

To: Targowska, Anna <atargowska@Steptoe.com>; Sterlin, Ian <isterlin@mccarter.com>; Proctor, Wyley <wproctor@McCarter.com>; Freeman,

Kia <KFreeman@McCarter.com>; 'Peter Siddoway' <psiddoway@sagepat.com>;
'Lynne Borchers' <LBorchers@sagepat.com>
Cc: SJAquestiveNC <SJAquestiveNC@Steptoe.com>; 'E. Bradley Evans'
<EBE@wardandsmith.com>; 'Joseph A. Schouten' <JAS@wardandsmith.com>;
'Susan J. St. Clair' <SJS@wardandsmith.com>;
Subject: RE: Aquestive v BioDelivery (No. 19-cv-00505-D) / Indivior et al. v BioDelivery (No. 5:15-cv-350-D)

Dear Anna,

As we previously explained, we ran into an issue with three custodians and we had to re-run those results. In any event, we have updated the search term hit data with the revised terms that you provided. As before, the figures in the chart indicate the number of documents responsive to the search term.

Several of these terms still result in an unreasonably large number of hits, including at least search terms 1, 4, 5, 6, and 8. Indeed, Aquestive has made its requests *broader* in certain respects. For example, Aquestive has added additional terms to phrases joined with an “or” in search term 1. Other of the terms continue to include very broad combinations (e.g., BEMA and bup* or nal*). As previously noted, BDSI's business involves, in part, making products that contain buprenorphine and naloxone, and a technology called BEMA.

Please let us know how you propose to further narrow these search terms to achieve a realistic number of hits.

Search Term Hits per Custodian

Term	Custodians
N. Vasisht M. Sirgo K. Schupp J. Thomas A. Finn J. Lockhard	
1. (film or laminate or roll or wafer or strip or disc) and (test or result or analy* or examin* or devel*) and (Buprenorphine or naloxone or bup* or nal* or BEMA or &#8220;Bioerodible Mucoadhesive&#8221; or &#8220;bilayer&#8221;) 4,904 16,866	14,963 9,666 245 2,885
2. (8,765,167 OR 167 OR &#8220;167 patent&#8221; OR &#8220;11/517,982&#8221; OR 517982 OR &#8220;517,982&#8221;) AND (Aquestive OR MonoSol OR Indivior OR Reckitt OR MSRX OR RB OR Suboxone) 249 2,821 33 77 10 151	

- 3. (N207932 OR N205637 OR 207932 OR 205637) AND (test OR result OR analy* OR examin* OR devel*)** 246 530 330 1,224 10 322
- 4. (BEMA or “Bioerodible Mucoadhesive” or “bilayer”) and (Buprenorphine or naloxone or bup* or nal* or Aquestive or MonoSol or Indivior or Reckitt or MSRX or RB or Suboxone)** 3,729 19,570 15,358 3,352 206 1,139
- 5. (ARx or Sharp or Endo or Lohmann or LTS or Tapemark) and (Buprenorphine or naloxone or bup* or nal* or BEMA or “Bioerodible Mucoadhesive” or “bilayer”)** 6,864 19,247 17,929 13,683 418 5,079
- 6. (Buprenorphine or naloxone or bup* or nal*) and (film or laminate or roll or wafer or strip or disc)** 5,447 19,176 17,384 12,155 292 4,278
- 7. (Myers or Sanghvi or Verrall or Francis or Moss or Kendall or Schobel or Barber) and (Aquestive or MonoSol or Indivior or Reckitt or MSRX or RB or Suboxone)** 196 1,648
46 30 54 32
- 8. (film or laminate or roll or wafer or buccal or sublingual) and (Aquestive or MonoSol or Indivior or Reckitt or MSRX or RB or Suboxone)** 1,741 14,626 737 243 215
377
- 9. Pharmfilm** 22 378 5 0 0 1
- 10. (Belbuca OR Bunavail) AND (N207932 OR N205637 OR 207932 OR 205637) AND (test OR result OR analy* OR examin* OR devel*)** 162 491 204 976 7 269

Sincerely,
Tom

Thomas F. Foley | Associate
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265 Franklin Street | Boston, MA 02110

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Boston | Hartford | Stamford | New York | Newark | East Brunswick | Philadelphia | Wilmington | Washington, DC | Miami

From: Targowska, Anna <[>](mailto:atargowska@Steptoe.com)
Sent: Thursday, February 10, 2022 6:17 PM
To: Sterlin, Ian <[>](mailto:isterlin@mccarter.com); Foley, Thomas F.
 <[>](mailto:tfoley@McCarter.com); Proctor, Wyley <[>](mailto:wproctor@McCarter.com); Freeman,

Kia <KFreeman@McCarter.com>; 'Peter Siddoway' <psiddoway@sagepat.com>;
'Lynne Borchers' <LBorchers@sagepat.com>
Cc: SJAquestiveNC <SJAquestiveNC@Steptoe.com>; 'E. Bradley Evans'
<EBE@wardandsmith.com>; 'Joseph A. Schouten' <JAS@wardandsmith.com>;
'Susan J. St. Clair' <SJS@wardandsmith.com>
Subject: RE: Aquestive v BioDelivery (No. 19-cv-00505-D) / Indivior et al. v BioDelivery (No. 5:15-cv-350-D)

****External Message****

*Aquestive v BioDelivery (No. 19-cv-00505-D)
Indivior et al. v BioDelivery (No. 5:15-cv-350-D)*

Counsel,

It has now been nearly four weeks and BDSI still has not provided the requested information regarding the number of hits for three of BDSI's ESI custodians. However, in the interests of avoiding further delay on BDSI's ESI productions and avoiding unnecessary disputes, Plaintiffs provide the following revisions to Term Nos. 1 and 4-7 for ***all*** custodians:

Term No. 1. (film or laminate or roll or wafer or strip or disc) and (test or result or analy* or examin* or devel*) and (Buprenorphine or naloxone or bup* or nal* or BEMA or “Bioerodible Mucoadhesive” or “bilayer”)

Term No. 4. (BEMA or “Bioerodible Mucoadhesive” or “bilayer”) and (Buprenorphine or naloxone or bup* or nal* or Aquestive or MonoSol or Indivior or Reckitt or MSRX or RB or Suboxone)

Term No. 5. (ARx or Sharp or Endo or Lohmann or LTS or Tapemark) and (Buprenorphine or naloxone or bup* or nal* or BEMA or “Bioerodible Mucoadhesive” or “bilayer”)

Term No. 6. (Buprenorphine or naloxone or bup* or nal*) and (film or laminate or roll or wafer or strip or disc)

Term No. 7. (Myers or Sanghvi or Verrall or Francis or Moss or Kendall or Schobel or Barber) and (Aquestive or MonoSol or Indivior or Reckitt or MSRX or RB or

Suboxone)

Please provide a date certain on which Plaintiffs can expect to receive BDSI's responsive ESI productions.

Regards,

Anna

Steptoe

Anna M Targowska

Steptoe & Johnson LLP | 227 West Monroe Street | Suite 4700 | Chicago, IL 60606
direct 312 577 1269 | fax 312 577 1370 | atargowska@Steptoe.com

From: Sterlin, Ian <isterlin@mccarter.com>;

Sent: Thursday, February 3, 2022 1:02 PM

To: Targowska, Anna <atargowska@Steptoe.com>; Foley, Thomas F. <tfoley@McCarter.com>; Proctor, Wyley <wproctor@McCarter.com>; Freeman, Kia <KFreeman@McCarter.com>; 'Peter Siddoway' <psiddoway@sagepat.com>; 'Lynne Borchers' <LBorchers@sagepat.com>;

Cc: SJAquestiveNC <SJAquestiveNC@Steptoe.com>; 'E. Bradley Evans' <EBC@wardandsmith.com>; 'Joseph A. Schouten' <JAS@wardandsmith.com>; 'Susan J. St. Clair' <SJS@wardandsmith.com>;

Subject: RE: Aquestive v BioDelivery (No. 19-cv-00505-D) / Indivior et al. v BioDelivery (No. 5:15-cv-350-D)

Dear Anna:

The term hits as used in Tom's email below refers to the number of documents responsive to the search term.

As previously indicated, we are updating our information for the remaining three custodians and will provide the search results when they are available.

Best regards,

Ian

Ian Sterlin | Associate

McCarter & English, LLP
265 Franklin Street | Boston, MA 02110

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Boston | Hartford | Stamford | New York | Newark | East Brunswick | Philadelphia | Wilmington | Washington, DC | Miami

From: Targowska, Anna <atargowska@Steptoe.com>;
Sent: Wednesday, February 2, 2022 7:30 AM
To: Foley, Thomas F. <tfoley@McCarter.com>; Sterlin, Ian
<isterlin@mccarter.com>; Proctor, Wyley <wproctor@McCarter.com>; Freeman,
Kia <KFreeman@McCarter.com>; 'Peter Siddoway' <psiddoway@sagepat.com>;
'Lynne Borchers' <LBorchers@sagepat.com>;
Cc: SJAquestiveNC <SJAquestiveNC@Steptoe.com>; 'E. Bradley Evans'
<EFE@wardandsmith.com>; 'Joseph A. Schouten' <JAS@wardandsmith.com>;
'Susan J. St. Clair' <SJS@wardandsmith.com>;
Subject: RE: Aquestive v BioDelivery (No. 19-cv-00505-D) / Indivior et al. v BioDelivery (No. 5:15-cv-350-D)

****External Message****

Counsel,

Please provide the information requested in my January 26th email.

Regards,

Anna

Steptoe

Anna M Targowska

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direct 312 577 1269 | fax 312 577 1370 | atargowska@Steptoe.com

From: Targowska, Anna
Sent: Wednesday, January 26, 2022 7:44 PM
To: Foley, Thomas F. <tfoley@McCarter.com>; Sterlin, Ian
<isterlin@mccarter.com>; Proctor, Wyley <wproctor@McCarter.com>; Freeman,
Kia <KFreeman@McCarter.com>; 'Peter Siddoway' <psiddoway@sagepat.com>;
'Lynne Borchers' <LBorchers@sagepat.com>;
Cc: SJAquestiveNC <SJAquestiveNC@Steptoe.com>; 'E. Bradley Evans'
<EFE@wardandsmith.com>; 'Joseph A. Schouten' <JAS@wardandsmith.com>;
'Susan J. St. Clair' <SJS@wardandsmith.com>;
Subject: RE: Aquestive v BioDelivery (No. 19-cv-00505-D) / Indivior et al. v BioDelivery (No. 5:15-cv-350-D)

Counsel,

Thank you for providing the additional information for the first three custodians. We are in the process of revising Aquestive's ESI search terms; however we cannot finalize the revisions without having information for all custodians.

Please promptly provide the search "hits" information for the remaining custodians. Relatedly, please clarify whether the term "hits" as used in BDSI's communications refers to the number of emails/records found after running the search, or the number of times a given search term appears across all emails/records searched. If neither, please explain the meaning of the term "hits" as used in your prior communications.

Regards,

Anna

Steptoe

Anna M Targowska

Steptoe & Johnson LLP | 227 West Monroe Street | Suite 4700 | Chicago, IL 60606
direct 312 577 1269 | fax 312 577 1370 | atargowska@Steptoe.com

From: Foley, Thomas F. <tfoley@McCarter.com>;
Sent: Thursday, January 20, 2022 9:30 AM
To: Targowska, Anna <atargowska@Steptoe.com>; Sterlin, Ian <isterlin@mccarter.com>; Proctor, Wyley <wproctor@McCarter.com>; Freeman, Kia <KFreeman@McCarter.com>; 'Peter Siddoway' <psiddoway@sagepat.com>; 'Lynne Borchers' <LBorchers@sagepat.com>;
Cc: SJAquestiveNC <SJAquestiveNC@Steptoe.com>; 'E. Bradley Evans' <EBE@wardandsmith.com>; 'Joseph A. Schouten' <JAS@wardandsmith.com>; 'Susan J. St. Clair' <SJS@wardandsmith.com>;
Subject: RE: Aquestive v BioDelivery (No. 19-cv-00505-D) / Indivior et al. v BioDelivery (No. 5:15-cv-350-D)

Dear Anna,

Thank you for your e-mail. Per your request, we provide below search term hits on a per-custodian basis for Niraj Vasisht, Mark Sirgo, and Kenneth Schupp. We ran into an issue with the other three custodians and we are re-running those results. Nonetheless, it is clear from the results for the three custodians shown below that many of these terms are overly broad with respect to all custodians. For example, Buprenorphine resulted in over 9,000 hits, over

33,000 hits, and over 25,000 hits, respectively; naloxone resulted in over 6,000 hits, over 18,000 hits, and over 18,000 hits, respectively; and BEMA resulted in almost 2,000 hits, over 23,000 hits, and over 18,000 hits, respectively. That these terms result in an unreasonable number of hits is unsurprising because the terms have not been limited in any way and BDSI's business involves, in part, making products that contain buprenorphine and naloxone, and a technology called BEMA. Regardless of the custodians, these terms will need to be narrowed to achieve a reasonable number of hits.

Search Term Hits per Custodian

Term	Custodians
N. Vasisht	M. Sirgo
(film or laminate or roll or wafer) and (test or result or analy* or examin* or devel*)	162
21,740	18,751
BEMA	1,714 23,376 18,695
&#8220;Bioerodible Mucoadhesive&#8221;	708 6,044 814
ARx	372 4,998 13,634
Sharp	8,163 5,345 9,214
Endo	4,720 33,742 9,920
LTS	4,415 4,670 1,078
Tapemark	5,221 2,289 12,403
Buprenorphine	9,529 33,592 25,004
naloxone	6,340 18,027 18,857
bup*	13,107 43,473 31,989
nal*	7,061 20,616 20,204
Myers or Sanghvi or Verrall or Francis or Moss or Kendall or Schobel or Barber	2,289
9,457	594
(film or laminate or roll or wafer or buccal or sublingual) and (Aquestive or MonoSol or Indivior or Reckitt or MSRX or RB or Suboxone)	1,714 13,580 723

With regard to your request that we modify certain search terms, we propose the following, shown in red text:

◦

BDSI Search Term 3 (Myers or Sanghvi or Verrall or Francis or Moss or Fuisz or Yang)

- **Custodian (Garry Myers):** 99% of records;
- We agree with your proposal to remove "Myers" from the search term for Custodian Garry Myers only.
- **Custodian (Mark Schobel):** over 17,000 records
- Please let us know the hits for each of the terms for this custodian so that we can identify which term or terms resulted in the hits.
- **BDSI Search Term 7** ((uniform* or concentration or amount or HPLC) and (active or film or API or buprenorphine))
 - **Custodian (Mark Schobel):** over 14,000 records
 - For Mark Schobel only, we propose to substitute the search term: ((uniform* or concentration or amount or HPLC) w/7 (active or film or API or buprenorphine))
- **BDSI Search Term 8** ((vary or vari* or active or concentration or amount) and (“5%” or “10%” or “15%” or “5 %” or “10 %” or “15 %” or “five percent” or “ten percent” or “fifteen percent”))
 - **Custodian (Keith Kendall):** over 22,000 records
 - **Custodian (Mark Schobel):** over 24,000 records
 - For Keith Kendall and Mark Schobel only, we propose to substitute the search term: ((vary or vari* or active or concentration or amount) w/7 (“5%” or “10%” or “15%” or “5 %” or “10 %” or “15 %” or “five percent” or “ten percent” or “fifteen percent”))

In the revised search terms above, "w/7" is intended to indicate a search in which a term in the first group appears within 7 words of a term within the second group.

Please let us know your revisions to the Aquestive search terms identified above. We look forward to hearing from you concerning the breakdown for Term 3 and proposed revised search terms for Terms 7 and 8.

Best,
Tom

Thomas F. Foley | Associate
McCarter & English, LLP
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Boston | Hartford | Stamford | New York | Newark | East Brunswick | Philadelphia | Wilmington | Washington, DC | Miami

From: Targowska, Anna <[>](mailto:atargowska@Steptoe.com); **Sent:** Wednesday, January 19, 2022 8:50 PM
To: Foley, Thomas F. <[>](mailto:tfoley@McCarter.com); Sterlin, Ian <[>](mailto:isterlin@mccarter.com); Proctor, Wyley <[>](mailto:wproctor@McCarter.com); Freeman, Kia <[>](mailto:KFreeman@McCarter.com); 'Peter Siddoway' <[>](mailto:psiddoway@sagepat.com); 'Lynne Borchers' <[>](mailto:LBorchers@sagepat.com); **Cc:** SJAquestiveNC <[>](mailto:SJAquestiveNC@Steptoe.com); 'E. Bradley Evans' <[>](mailto:EBE@wardandsmith.com); 'Joseph A. Schouten' <[>](mailto:JAS@wardandsmith.com); 'Susan J. St. Clair' <[>](mailto:SJS@wardandsmith.com); **Subject:** RE: Aquestive v BioDelivery (No. 19-cv-00505-D) / Indivior et al. v BioDelivery (No. 5:15-cv-350-D)

****External Message****

Counsel,

Please provide the custodian information requested in my January 12 email so that we can evaluate BDSI's request to narrow Aquestive's ESI search terms.

With respect to BDSI's ESI search terms, several have resulted in an unreasonable amount of hits as outlined below:

- **BDSI Search Term 3** (Myers or Sanghvi or Verrall or Francis or Moss or Fuisz or Yang)
 - **Custodian (Garry Myers):** 99% of records; we suggest removing the word 'Myers' from the search term for this custodian only
 - **Custodian (Mark Schobel):** over 17,000 records
- **BDSI Search Term 7** ((*uniform* or concentration or amount or HPLC) and (active or film or API or buprenorphine))
 - **Custodian (Mark Schobel):** over 14,000 records

- **BDSI Search Term 8** ((vary or vari* or active or concentration or amount) and
 (“5%” or “10%” or “15%” or
 “5 %” or “10 %” or “15 %” or
 “five percent” or “ten percent” or “fifteen
 percent”))
 - **Custodian (Keith Kendall):** over 22,000 records
 - **Custodian (Mark Schobel):** over 24,000 records

Please provide proposed replacement ESI search terms per custodian. Once these search terms have been properly narrowed, we will be in a position to provide a date certain for production.

Regards,

Anna

Steptoe

Anna M Targowska

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 direct 312 577 1269 | fax 312 577 1370 | atargowska@Steptoe.com

From: Targowska, Anna

Sent: Wednesday, January 12, 2022 6:51 PM

To: Foley, Thomas F. <tfoley@McCarter.com>; SJAquestiveNC <SJAquestiveNC@Steptoe.com>; Hibey, James <jhibey@steptoe.com>; Lucia, Jamie <jlucia@Steptoe.com>; Abramic, John <jabramic@Steptoe.com>; 'Joseph A. Schouten' <JAS@wardandsmith.com>; 'E. Bradley Evans' <EBC@wardandsmith.com>; 'Susan J. St. Clair' <SJS@wardandsmith.com>; Gelwicks, Daniel <dgelwicks@Steptoe.com>;

Cc: Freeman, Kia <KFreeman@McCarter.com>; Proctor, Wyley <wproctor@McCarter.com>; 'Lynne Borchers' <LBorchers@sagepat.com>; 'Peter Siddoway' <psiddoway@sagepat.com>; Sterlin, Ian <isterlin@mccarter.com>;
Subject: RE: Aquestive v BioDelivery (No. 19-cv-00505-D) / Indivior et al. v BioDelivery (No. 5:15-cv-350-D)

Counsel,

Aquestive is reviewing your request to revise its ESI search terms. However, in order to proceed we need to understand the volume of hits per custodian to determine if an adjustment is necessary or reasonable on a custodian by custodian basis. Please provide that information at your earliest convenience.

Regards,

Anna

Steptoe

Anna M Targowska

Steptoe & Johnson LLP | 227 West Monroe Street | Suite 4700 | Chicago, IL 60606

direct 312 577 1269 | fax 312 577 1370 | atargowska@Steptoe.com

From: Foley, Thomas F. <tfoley@McCarter.com>;

Sent: Wednesday, January 12, 2022 3:58 PM

To: Targowska, Anna <atargowska@Steptoe.com>; Foley, Thomas F.

&<tfoley@McCarter.com>; SJAquestiveNC <SJAquestiveNC@Steptoe.com>; Hibey, James <jhibey@steptoe.com>; Lucia, Jamie <jlucia@Steptoe.com>; Abramic, John <jabramic@Steptoe.com>; 'Joseph A. Schouten' <JAS@wardandsmith.com>; 'E.

Bradley Evans' <EBE@wardandsmith.com>; 'Susan J. St. Clair'

&<SJS@wardandsmith.com>; Gelwicks, Daniel <dgelwicks@Steptoe.com>;

Cc: Freeman, Kia <KFreeman@McCarter.com>; Proctor, Wyley

&<wproctor@McCarter.com>; 'Lynne Borchers' <LBorchers@sagepat.com>; 'Peter Siddoway' <psiddoway@sagepat.com>; Sterlin, Ian <isterlin@mccarter.com>;

Subject: RE: Aquestive v BioDelivery (No. 19-cv-00505-D) / Indivior et al. v BioDelivery (No.

5:15-cv-350-D)

Dear Counsel:

We have run the search terms that you proposed for the email custodians identified. The search yielded a total of almost 200,000 hits. Six of the requested terms, identified below, yielded a very large numbers of hits. In order to achieve a reasonable volume for review, please provide revised search terms for this items. In the case of terms joined by an “or” without further qualification and yielding over 50,000 hits, we have broken down the search by individual word to assist in revising the search terms.

1. (film or laminate or roll or wafer) and (test or result or analy* or examin* or devel*) [over 49,000 hits]
4. BEMA [over 47,000 hits] or “Bioerodible Mucoadhesive” [over 7,000 hits] or “bilayer” [over 1,000 hits]
5. ARx [over 27,000 hits] or Sharp [over 23,000 hits] or Endo [over 49,000 hits] or Lohmann [over 4,000 hits] or LTS [over 10,000 hits] or Tapemark [over 20,000 hits]

6. Buprenorphine [over 68,000 hits] or naloxone [over 43,000 hits] or bup* [over 89,000 hits] or nal* [over 48,000 hits]
7. Myers or Sanghvi or Verrall or Francis or Moss or Kendall or Schobel or Barber [over 12,000]
8. (film or laminate or roll or wafer or buccal or sublingual) and (Aquestive or MonoSol or Indivior or Reckitt or MSRX or RB or Suboxone) [over 16,000 hits]

Finally, please let us know the status of Plaintiffs' production of emails.

Best regards,
Tom

Thomas F. Foley | Associate
McCarter & English, LLP
265 Franklin Street | Boston, MA 02110

tfoley@mccarter.com | www.mccarter.com | V-Card
T 617.449.6575 M 973.902.3570

Boston | Hartford | Stamford | New York | Newark | East Brunswick | Philadelphia | Wilmington | Washington, DC | Miami

From: Targowska, Anna <atargowska@Steptoe.com>;
Sent: Tuesday, November 30, 2021 7:59 PM
To: Foley, Thomas F. <tfoley@McCarter.com>; SJ Aquestive NC <SJAquestiveNC@Steptoe.com>; Hibey, James <jhibey@steptoe.com>; Lucia, Jamie <jlucia@Steptoe.com>; Abramic, John <jabramic@Steptoe.com>; 'Joseph A. Schouten' <JAS@wardandsmith.com>; 'E. Bradley Evans' <EBC@wardandsmith.com>; 'Susan J. St. Clair' <SJS@wardandsmith.com>; Gelwicks, Daniel <dgelwicks@Steptoe.com>;
Cc: Freeman, Kia <KFreeman@McCarter.com>; Proctor, Wyley <wproctor@McCarter.com>; 'Lynne Borchers' <LBorchers@sagepat.com>; 'Peter Siddoway' <psiddoway@sagepat.com>;
Subject: RE: Aquestive v BioDelivery (No. 19-cv-00505-D) / Indivior et al. v BioDelivery (No. 5:15-cv-350-D)

****External Message****

Counsel,

For each of the following custodians:

- Andrew Finn (former Executive VP ; Product Development)
- Joseph Lockhart (Senior Vice President ; Operations)
- Kenneth Schupp (former Director - Pharmaceutical Development / Analytical Chemistry / Quality Control)
- Mark Sirgo (former President & CEO)
- Joey Thomas (Senior Director - Technical Operations)
- Niraj Vasisht (former Chief Technology Officer and Senior VP ; Product Development)

Aquestive requests that the following searches be performed:

1. (film or laminate or roll or wafer) and (test or result or analy* or examin* or devel*)
2. (8,765,167 or 167 or ;167 patent; or ;11/517,982; or 517982 or ;517,982;) and (Aquestive or MonoSol or Indivior or Reckitt or MSRX or RB or Suboxone)

(N207932 or

Attachments:

image001.png (7024 Bytes)